

# Exhibit 1

**From:** [Randall Garteiser](#)  
**To:** [Geyer, Kate](#)  
**Cc:** [Damitio, Chris](#); [Machleidt, Dario](#); [mikejones@potterminton.com](mailto:mikejones@potterminton.com); [Shaun Hassett](#); [Jessica Kaempf](#); [Hannah Reid](#); [Michael Sacksteder](#)  
**Subject:** Re: Quantum v. Valve Corp. - motion and proposed order to file Valve's motion to dismiss under seal.  
**Date:** Thursday, April 4, 2024 10:33:43 AM

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Thanks, for sending the Saturday email to me.

So after delaying weeks on providing 2 deposition dates and a date for source code review now, Valve would like to stay the cases after insuring to me that Valve was going to work on getting dates so there was no need to bother the discover judge?

And, now Valve wants to file a slew of motions when we know the joint DCO allows for amendments to pleadings and indeed Valve itself amended multiple times in Washington just recently, resulting in the entire briefing schedule being entered by order by that court to accommodate Valve Corp. Plaintiffs reserve their rights.

1. Will Valve stipulate to not asserting a licensing defense? Specifically, will Valve confirm that it will not contend that under the prior "global" settlement and licensing agreement that it is licensed to the patents asserted in these 3 cases?

2. Would Valve be willing to waive filing fees motion in exchange for the stays in all 3 cases?

What can I offer my Clients, as a stay seems great for the well-funded Valve Corp., but not for our patent holder plaintiffs.

Respectfully, lets push off talking until Valve has a chance to confirm its position on items 1 and 2 above so we can have a productive call. Monday afternoon works for us, as I will need to get confirmation from my client once I hear back on items 1 and 2 above.

Be well,  
Randy



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On Apr 4, 2024, at 10:59 AM, Geyer, Kate <[KGeyer@ktslaw.com](mailto:KGeyer@ktslaw.com)> wrote:

Randy –

Dario's email from March 30 which is attached for reference sets forth the motions we intend to file. We asked for a meet and confer on Monday. Plaintiff has been on notice of these motions for days and there is no reason to delay a meet and confer on these issues.

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